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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re : **Chapter 11 Case No.**
LEHMAN BROTHERS HOLDINGS INC., et al. : **08-13555 (JMP)**
Debtors. : **(Jointly Administered)**

**DECLARATION OF KERI REED IN SUPPORT OF
DEBTORS' NINETY-SEVENTH, NINETY-EIGHTH AND NINETY-NINTH
OMNIBUS OBJECTIONS TO CLAIMS (INSUFFICIENT DOCUMENTATION)**

Pursuant to 28 U.S.C. §1746, I, Keri Reed, declare:

1. I am over 18 years of age and have personal knowledge of all of the facts set forth in this declaration and if called upon to testify as a witness, I could testify to the truth of the matters set forth herein.

2. I submit this Declaration in support of (i) *Debtors' Ninety-Seventh Omnibus Objection to Claims (Insufficient Documentation)* [Docket No. 14492], (ii) *Debtors' Ninety-Eighth Omnibus Objection to Claims (Insufficient Documentation)* [Docket No. 14493] and (iii) *Debtors' Ninety-Ninth Omnibus Objection to Claims (Insufficient*

Documentation) [Docket No. 14494] (collectively, the “Objections”).

3. I am an Assistant Vice President of LAMCO LLC. LAMCO LLC is a non-debtor subsidiary of Lehman Brothers Holdings, Inc. (“LBHI”) that has been charged with managing LBHI’s assets. I have held this position since September 2010.

4. As a part of my duties as Assistant Vice President, I have contacted each of the claimants (the “Claimants”) whose proofs of claim are identified in Exhibit A to each of the Objections, and have requested data supporting their claims in order to permit the Debtors to evaluate the validity of such claims. I requested both qualitative and quantitative data including but not limited to: the seller loan number; the buyer loan number; the servicer loan number and servicer name; the type of claim (i.e., misrepresentation of value); the address of the real property securing the mortgage loan; unpaid principal balance on the loan; and the status of the loan. Notwithstanding such requests, the Claimants have either (i) not provided the requested information and data supporting their claims, (ii) provided insufficient data and information that does not support the validity of their claims or (iii) requested that a confidentiality agreement be entered into before providing any data or information and have not yet provided any data, confidential or otherwise.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: February 14, 2011

/s/ Keri Reed

Keri Reed